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Attorney for Defendant
SHAUN ANDERSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:17-cr-00363-APG-EJY
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO
v.)	CONTINUE SENTENCING
)	
SHAUN ANDERSON,)	
)	
Defendant.)	(4 th Request)

IT IS HEREBY STIPULATED by and between SHAUN ANDERSON, Defendant, by and through counsel EMILY K. STRAND, ESQ., and the United States of America, by and through, SIMON KUNG, Assistant United States Attorney, that the sentencing in the above-captioned matter currently scheduled for April 21, 2021, be continued sixty (60) days, or to a date and time to be set by this Honorable Court.

This Stipulation is entered into for the following reasons:

1. Counsel for the defendant was only appointed to the case on January 5, 2021.
2. The two parties have been engaged in ongoing negotiations; however, those negotiations have been slow, due to the fact it can be difficult for Defense Counsel to meet with Mr. Anderson due to ongoing Covid-19 restrictions.

1 3. Counsel has spoken to Assistant United States Attorney Simon Kung and he has no
2 opposition to the continuance.

3 4. Denial for this request for continuance would deny the parties the opportunity to
4 settle both this case and another unindicted case.

5 5. Additionally, denial of this request for continuance would result in a miscarriage of
6 justice.

7 6. For all the above-stated reasons, the ends of justice would best be served by a
8 continuance of the trial date.

9 7. This is the 4th request for a continuance of the sentencing date in this case.
10

11 DATED this 15th day of April 2021.
12

13 Respectfully submitted,

14
15 PITARO & FUMO, CHTD.

CHRISTOPHER CHIOU
ACTING UNITED STATES ATTORNEY

16
17 /s/ Emily K. Strand
18 EMILY K. STRAND, ESQ.
19 601 LAS VEGAS BOULEVARD S.
20 LAS VEGAS, NEVADA 89101
21 ATTORNEY FOR DEFENDANT
22 SHAUN ANDERSON
23
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/s/ Simon Kung
SIMON KUNG, ESQ.
ASSISTANT UNITED STATES ATTORNEY
501 LAS VEGAS BOULEVARD SOUTH. #1100
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Defendant.)	(4 th Request)

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds:

1. Counsel for the defendant was only appointed to the case on January 5, 2021.
2. The two parties have been engaged in ongoing negotiations; however, those negotiations have been slow, due to the fact it can be difficult for Defense Counsel to meet with Mr. Anderson due to ongoing Covid-19 restrictions.
3. Counsel has spoken to Assistant United States Attorney Simon Kung and he has no opposition to the continuance.
4. Denial for this request for continuance would deny the parties the opportunity to settle both this case and another unindicted case.

1 5. Additionally, denial of this request for continuance would result in a miscarriage of
2 justice.

3 6. For all the above-stated reasons, the ends of justice would best be served by a
4 continuance of the trial date.

5 7. This is the 4th request for a continuance of the sentencing date in this case.
6

7 CONCLUSIONS OF LAW

8 The end of justice served by granting said continuance outweigh the best interest of the
9 public and defendants in a speedy trial since the failure to grant said continuance would likely
10 result in a miscarriage of justice, would deny the parties herein sufficient time and the
11 opportunity to be able to effectively and thoroughly negotiate this matter taking into account the
12 exercise of due diligence.

13 ORDER

14 **IT IS ORDERED** that sentencing currently scheduled for April 21, 2021 be vacated and
15 continued to this 30th day of June, 2021, at the hour of 3:00 p.m. in Courtroom 6C.

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18 DATED this 15th of April, 2021.

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21 _____
22 U.S. DISTRICT JUDGE
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